

Exhibit 55

STATE OF TEXAS, ET AL. v. UNITED STATES OF AMERICA, ET AL.
Dr. Leighton Ku on 06/27/2018

1	IN THE UNITED STATES DISTRICT COURT	
2	FOR THE SOUTHERN DISTRICT OF TEXAS	
	BROWNSVILLE DIVISION	
3	+ + + + +	
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5	IN THE MATTER OF:	:
6	STATE OF TEXAS, et al.,	:
7	Plaintiffs,	:
8	v.	: Case No.
9	UNITED STATES OF AMERICA,	: 1:18-CV-68
10	et al.,	:
11	Defendants,	:
12	and	:
13	KARLA PEREZ, et al.,	:
14	Defendant-	:
15	Intervenors,	:
16	and	:
17	STATE OF NEW JERSEY,	:
18	Defendant-	:
	Intervenor.	:
19	-----	:
20	Wednesday,	
21	June 27, 2018	
22	Washington, D.C.	
23	DEPOSITION OF:	
24	LEIGHTON KU	
25		

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1 called for examination by Counsel for the
2 Plaintiffs, pursuant to Notice of Deposition, in
3 the Mexican American Legal Defense and Education
4 Fund, located at 1016 16th Street, NW,
5 Washington, D.C., when were present on behalf of
6 the respective parties:

7 APPEARANCES:

8 On Behalf of the Plaintiffs, State of Texas, et
9 al.:

10 ADAM ARTHUR BIGGS, ESQ.
11 State of Texas
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14 Austin, TX 78711-2548
15 512-936-0750
16 512-936-0545 fax
17 adam.biggs@oag.texas.gov

18 On Behalf of the Defendants, United States of
19 America, et al.:

20 AARON S. GOLDSMITH, ESQ.
21 U.S. Department of Justice
22 Civil Division
23 Office of Immigration Litigation
24 Liberty Square Building
25 450 5th Street, NW
Washington, D.C. 20530
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1 APPEARANCES: (CONT.)

2 On Behalf of the Defendant-Intervenors, Karla
Perez, et al.:

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4 ALEJANDRA AVILA, ESQ.
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Fund (MALDEF)
6 110 Broadway
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9 On Behalf of the Defendant-Intervenors, State of
New Jersey, et al.:

10

11 KENNETH S. LEVINE, ESQ.
12 State of New Jersey
Department of Law and Public Safety
Division of Law

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1 correctly?

2 A Yes.

3 Q Will you explain to me how the state
4 government providing public insurance coverage
5 for DACA recipients works?

6 A Again, to the extent that there are
7 federal funds that are involved DACA recipients
8 are not eligible for Medicaid or for the health
9 exchanges or for premium tax assistance.

10 State or local governments may offer
11 public insurance if they opt and that they don't
12 get federal funding support in that case.

13 The exception that I think I discussed
14 in this area is that there is a specific benefit,
15 emergency Medicaid assistance that is available
16 to low income people regardless of immigration
17 status that is available.

18 This is a mandatory component of
19 Medicaid. In addition, a large number of
20 facilities provide uncompensated care to low
21 income patients.

22 In many cases it's not necessarily
23 done through insurance, but they provide
24 uncompensated care.

25 Q And you said "emergency Medicaid,"

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1 C E R T I F I C A T E


2 This is to certify that the foregoing transcript
3 Deposition of: Dr. Leighton Ku

4 In the matter of: State of Texas v USA
5 Before: US District Court for Southern
6 District of Texas

7 Date: 06-27-18

8 Place: Washington, DC

9 were duly recorded and accurately transcribed
10 under my direction; further, that said transcript
11 is a true and accurate record of the proceedings;
12 and that I am neither counsel for, related to,
13 nor employed by any of the parties to this action
14 in which this deposition was taken; and further
15 that I am not a relative nor an employee of any
16 of the parties nor counsel employed by the
17 parties, and I am not financially or otherwise
18 interested in the outcome of the action.

19 
20 -----

21 Neal Gross
22 Court Reporter

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24

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